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6 Attorney for Defendant  
HOOTAN MELAMED

7  
8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 HOOTAN MELAMED (1),

14 Defendant.

CASE NO. 16CR1409H

**UNOPPOSED MOTION  
AUTHORIZING TRAVEL FOR  
DEFENDANT HOOTAN  
MELAMED DURING PRETRIAL  
RELEASE**

**[[PROPOSED] ORDER LODGED  
CONCURRENTLY HEREWITH]**

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17 Defendant Hootan Melamed ("Melamed"), by and through his counsel of  
18 record, Steven M. Goldsobel, hereby brings this Unopposed Motion for Travel  
19 During Pretrial Release.

20 1. On June 16, 2016, Melamed was indicted in *United States v.*  
21 *Melamed, et al.*, Case No. 16CR1409H, and, currently, he is on pretrial release.  
22 Melamed currently is authorized to travel throughout the State of California.

23 2. Melamed wishes to visit a close friend in Las Vegas, Nevada from  
24 August 5, 2016 through August 8, 2016.

25 3. Assistant United States Attorney Valerie H. Chu ("Ms. Chu") does not  
26 oppose Melamed traveling to Las Vegas, Nevada, from August 5, 2016 through  
27 August 8, 2016, so long as Melamed provides Ms. Chu and Pretrial Services  
28 Officer in the Central District of California Damion Davis ("Officer Davis") with  
Melamed's itinerary before leaving and Melamed notifies Officer Davis of

1 Melamed's departure from and return to Los Angeles, California. Officer Davis  
2 does not oppose Melamed traveling to Las Vegas, Nevada from August 5, 2016  
3 through August 8, 2016.

4 4. In addition, Melamed's Pretrial Services Officer in the Southern  
5 District of California, Sabrina Hall, does not oppose Melamed traveling to Las  
6 Vegas, Nevada from August 5, 2016 through August 8, 2016.

7 5. Accordingly, Melamed respectfully requests that the Court enter an  
8 order authorizing Melamed to travel from Los Angeles, California to Las Vegas,  
9 Nevada to visit his close friend from August 5, 2016 through August 8, 2016.

10 Dated: August 3, 2016

Respectfully submitted,

11  
12 LAW OFFICES OF STEVEN GOLDSOBEL  
A PROFESSIONAL CORPORATION

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14 By: /s/ Steven M. Goldsobel  
15 STEVEN M. GOLDSOBEL  
Attorney for Defendant Hootan Melamed  
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10 Attorney for Defendant  
11 HOOTAN MELAMED

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOOTAN MELAMED (1),

Defendant.

CASE NO. 16CR1409H

**PROOF OF SERVICE**

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over the age of  
4 18 and not a party to the within action; my business address is 1901 Avenue of the Stars, Suite  
1750, Los Angeles, CA 90067.

5 On August 3, 2016, I served the foregoing document described as:

6 **UNOPPOSED MOTION AUTHORIZING TRAVEL FOR DEFENDANT**  
7 **HOOTAN MELAMED DURING PRETRIAL RELEASE**

8 on the interested parties in this action by placing true copies thereof enclosed in a  
sealed envelope, addressed as follows:

9 Gerald M. Werksman, Sr.  
10 Gerald M. Werksman, Esq.  
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Irvine, CA 92614  
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949-756-9060 f  
13 *Attorney for Defendant Jean*  
*Francois Picard*

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*Attorney for John Pangelinan*

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18 *Attorney for Phong Hung Tran*

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24 *Attorney for USA*

1  
2 **[X] BY ELECTRONIC MAIL OR ELECTRONIC TRANSMISSION:**

3 Based on a court order or an agreement of the parties to accept service by e-  
4 mail or electronic transmission, I caused the document to be sent to the respective e-  
5 mail addresses of the parties. I did not receive, within a reasonable time after the  
6 transmission, any electronic message or other indication that the transmission was  
7 unsuccessful.

8 I declare under penalty of perjury under the laws of the State of California that the  
9 foregoing is true and correct.

10 Executed on August 3, 2016, at Los Angeles, California.

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14 Samantha Carranza  
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